

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

EShed Alston

Plaintiff

JURY TRIAL DEMAND

v.

Delaware Department of Education

Secretary Bunting and Equality

Delaware foundation Inc., and Mark

Purpura of the firm of Richards

Layton and Finger PA., et al.,

Defendants

DELAWARE SCHOOL TAX PAYER ESHED ALSTON FILING OF OBJECTIONS AND COMPLAINT COMMENCED PURSUANT TO APPLICATION OF ESTABLISHED STANDARDS OF DELAWARE LAW AND CONSTITUTIONAL LEGAL AUTHORITY SEEKING INJUNCTIVE RELIEF AGAINST NAMED DEFENDANTS PROPOSED INTENT DEPARTMENT OF EDUCATION AND EQUALITY DELAWARE FOUNDATION INC., MARK PURPURA WHEREAS IMPLEMENTATION OF PROVISIONS OF PROPOSED 225 COVERTLY UNCONSTITUTIONALLY PROMOTES HOMOSEXUALITY AND TRANSGENDERISM THAT ARE FORCED ON OUR CHILD THE DEFINITION OF FACTIUAL STATE SPONSORED PROFOUNDLY ANTI-CHRISTIAN SOCIAL AGENDA There is one supreme omniscient omnipresent omnipotent almighty and unchanging Father **GOD**

Come now Delaware payer of 30 years of school taxes paid. Honorably discharges USAF veteran EShed Alston filing of objectively reasonable complaint seeking injunctive relief and hearing **BEFORE** this proposed law be enacted. The complaint raises legitimate significant genuine concerns of the true underlining motives and motivations driving the defendants. 225 is pretext designed to give adults access to your children and is a transparent smoke screen in fact what is proposed by the State and Equality Delaware foundation Inc is absent moral imperatives

and significantly anti-Christian in effect and as described herein as promotion of a profoundly anti-Christian social agenda orchestrated by the Department of Education and the so call Equality of Delaware Inc that are perpetrated by the defendants through Mark Purpura as devised contrived trick and scheme that are unconstitutional and are materially in violation of 42 USC 1983 provisions. The noted actions complained of as promoted are aided and abetted by the Equality Delaware Foundation INC. and or their public spokesman Mark Purpura.

1. For the record the proposed law is a transparent fabricated contrived smokescreen for inappropriate social promotion at State expense of profoundly anti-Christian bizarre concepts such as the social promotion of ungodly transgenderism and that of sexual alterations controlled by the State perpetrated against 10 year olds without the permission or the input of the parents that are controlled by the Department of Education documents a government that is governed by unconstitutional and profoundly perverse ideas as that of sanctuary cites that are literally State social security for illegal foreigners at State tax payer's expense documenting State resources reserved for the benefit of illegal aliens who are unlawfully amongst us true American citizens.
2. When teaching Para Legal studies I devised a methodology for explaining the general expected applied parameters and of the continuity of the dynamics of legal proceedings in the state of Delaware by my experience consisting of three particular letters representing 3 key words that are ANTECEDENT PRECEDENT and SUBSEQUENT and are defined as 1. First, original, or foundational 2. Occurrences, circumstances, or events 3. Result, conclusions or final actions. The current operative Delaware Constitution of 1897 is materially relevant to the establishment of objectively reasonable contemporary understandings opposed to the converse.
3. The State Department of Education and defendant's to include Mark Purpura and or the Equality Delaware Foundation Inc., converse and otherwise objectively unreasonable admittedly contemporary and subjective proposition is one that circumvents and undermines and completely ignores the important original antecedent Christian and **GOD** centered Constitutional foundation

of all contemporary or to include current Delaware law materially then and now law of the land.

4. It is the antecedent foundation of Christian reality that is permanently preserved as the corner stone factor identified in the Delaware Constitution historical mandates. That incorporated Delaware Constitution mandate references of 1776 permanently invalidates the defendant's false premise and circumvents the integrity of proposed public law 225 entirely as unconstitutional.

5. The devious false premises of the proposals must be rejected with prejudice as materially anti-Christian underlining propositions circumstantially and factually that must be rejected as unconstitutional. Provision proposition and application of the constitution of the State of Delaware of 1776 documents with specificity and with circumstantial particularity why the proposed misapplication of the changes in the law proposed 225 must be wholly rejected and completely abandoned by the State of Delaware. The Equality Delaware foundation Inc., presentations represents materially unsound public policies that are ripe with both intended and unintended consequences that impact adversely as materially anti-Christian and also absolutely comprehensively unconstitutional and manifestly circumstantially ungrantable as a objectively unreasonable anti **GOD** and or anti Christian proposition or as a legislative intent or a proposal.

6. Delaware Constitution of 1776 ARTICLE 6, Clause Delaware Constitution of 1776 ART.22 "AND also make and subscribe the following declaration, to wit: I, AB, do profess faith in God the Father and in Jesus Christ His only son and in the Holy Ghost, one God, blessed for ever more; and i do acknowledge the holy scripture of the Old and New testament to be given by DIVINE inspiration." It is presented as sound cogent objectively reasonable presentation of argument that the current operative Delaware constitution is the 1897 321 year old edition thereof. The antecedent constitutional example to the subsequent and current 1897 example precedent is as a matter of fact and law the incorporated and referenced Constitution of 1776.

FEDERAL LEGAL REQUIREMENTS INVOKED ARE APPLICABLE AND ARE CONSISTENT WITH A STATE COURT AND ARE MATERIALLY VIOLATIONS OF INVOKED 42 USC 1981, 83, 85, 86 AND 88 APPLICATIONS REGARDING AND IN TERMS OF STATE AND FEDERAL CONSTITUTIONAL LAW AND IN LEGAL REQUIREMENTS AND IN INCORPORATED PROHIBITIONS AGAINST STATE OBSTRUCTED DUE PROCESS AND EQUAL PROTECTION OF LIBERTY OF CHOICE

1. 42 USC 1981 prohibits race discrimination in the making and enforcing of contracts. "ALL citizens in the United States Shall have the same rights in every State and territory to make and enforce contracts to sue be parties give evidence and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens shall be subject to like punishments pains and penalties taxes licenses and extractions of every kind and to know other." Absent in the law are any material reference whatsoever it is argued in the relevant 42 USC 1981 provision to sexual orientation or trans gender identity or gender identity or gender expression identity or sexual characteristics identity exploitation factors only to race.

2. 42 USC 1981 codifies the right of the ~~prose~~ black plaintiffs to be opposed to proposal 225.

3. 42 USC 1983 codifies the prohibition against deprivation of civil rights in any State courts.

4. 42 USC 1883 prohibits deprivation of civil rights in protection of the ~~prose~~ Black plaintiff's.

"EVERY person who under color of any statute ordinance regulation custom or usage of any State or territory or the district of Columbia subjects or causes to be subjected any citizen of the United States or other persons within its jurisdiction thereof the deprivation of any rights privileges or immunities secured by the constitution law shall be liable to the person injured in and action at law suit in equity or other proper proceedings for redress." Present in the law is the liability incorporated into the law that holds the Governor to the same liability as any citizens. It is argued Black citizens have legal rights protections that are just as comprehensive as those reserved for defendants. It is unlawful to recognize rights of homosexuals and trans genders

while simultaneously ignoring black citizen who also have material manifest legal rights the State court must accept as a matter of both application to federal and in State Constitutionality.

5. 42 USC 1985 codifies that it is unlawful to conspire to interfere with enumerated civil rights protections that are inherent in State required due process of law and equal protection of law application of provision of 1981 and 1983 and 1985 and 1988. It appears that the State and the Department of education has conspired with the Equality Delaware foundation Inc., to conspire to deprive the plaintiff the equal protection of law and due process of the federal and State law.

6. 42 USC 1986 codifies the significant legal consequences for neglect to prevent foreseeable malicious harm on individuals and on the public welfare on the part of State government and the trans gender defendants seeking unacceptable access to our children that is created by the proposal 225 is absent consideration of legally required application of 42 USC 1981 and of 1983 and 1986 provisions that are the absolute civil legal right of the parents and not the defendants.

7. 42 USC 1986 Action for Neglect to prevent: EVERY person having knowledge that any of the wrongs conspired to be done and mentioned in section 1985 of this title are about to be committed and having the power to prevent or aid in preventing the commission of same neglects or refuses to do so. If such wrongful act be committed shall be liable to the party injured or his legal representative for all damages caused by such wrongful act which such person by reasonable diligence could have prevented and such damages may be recovered in an action on the case and any number of persons guilty of such wrongful neglect or refusal may be joined as defendants in the action. It is the institution of the Christian family and families in general consisting of a man and women physically capable of producing children. It is the children that are placed at real risk of public safety concerns of exploitation that are placed at real risk because homosexual marriages in 8 years have produced no children nor ever will produce children as a direct result the community intends recruitment and indoctrination of other people children yours

PLAINTIFFS OBJECTIVE REASONABILITY ARGUMENTS THAT ARE BASED ON RELEVANT MATERIAL AND CONSTITUTIONAL DISQUALIFICATIONS AND LEGAL STANDARDS OF COVERT COMPONENTS AND HIDDEN DISGUISED AND CORRUPT ANT-CHRISTIAN ELEMENTS OF THE ATTACHED DOCUMENT ORIGINATING FROM DEFENDANT THE EQUALITY DELAWARE FOUNDATION WEB SITE ASSERTIONS

1. As a matter of LAW provisions in the current Delaware constitution of 1897 absolutely settles the matter as a matter of law. For example in the applications of ARTICLE XV Miscellaneous.

2. Section 10. Disqualification to hold office by reason of SEX. NO CITIZEN of the State of Delaware shall be disqualified to hold and enjoy any office or public trust under the laws of the state by reason of SEX. It is noted that there is no mention of gender whatsoever in the law and it is argued that gender is not the same reference as sex which is defined as male or female genders which is absolutely not transferable or interchangeable for insertion of the words gender and phrases also used by the defendants such as trans-gender and gender identity expression used by the defendants. The term SEX is specifically employed not GENDER used which is absolute as a matter of established sound and settled doctrine according to almighty **GOD** who never said gender in the Bible. In terms of the specificity of constitutionally of both the Delaware Constitution of 1776 and 1897 they are materially consistent in the subsequent operative applied current Delaware constitution of 1897 currently provides that which is expressed in therein. The PREAMBLE of the Delaware Constitution of 1897 that provides particular and specific incorporated wording asserting as a matter of the Delaware law of men and regarding the more important absolute authority of almighty **GOD**. THROUGH divine goodness as all people have by NATURE the right of Worshipping and serving their creator according to the dictates of their consciences and of enjoying and defending life and liberty The manifest argument is the only absolute sovereign control is **GOD** and the State of Delaware Constitution. What does American currency state as associated applied doctrine and a reflection of America our unique money says IN GOD WE TRUST that is Stated doctrine absolutely not in trans-genderism as a matter of fact.

RACIAL DISCRIMINATION AS A MATTER OF RACE ABSOLUTELY HAVE NO REAL CONNECTION OR TRUE ASSOCIATION AS A MATTER OF FACT AND LAW TO THE CONFLATED REFERENCES THAT ARE MADE BY DEFENDANTS IN SIGNIFICANT MISREPRESENTATIONS THAT ARE MADE BY THE DEFENDANTS FALSE CLAIMS

1. It is raised as argument all things being equal that were the State of Delaware to ignore the Christian community and the majority of citizens. To act and do as this tiny minority of trans gender homosexual lobby is suggesting and not yield to the majority of citizens interest. Whereas the State of Delaware is intentionally officially unconstitutionally acting against the public will and liberty. The State is intentionally acting against the majority of State citizens those manifest corrupt actions of the State and the defendants are unconstitutionally forced acceptance of transgenderism on the majority and on the Christian Public to the coerced acceptance illegally and unconstitutionally. At some point and legal forum the manifest will of the majority of the Christian and citizens will prevail in court actions over what materially is a government acting unconstitutionally. The noted activities would also be dealt with by election of another Governor that understands that the majority rules to be emphasized through replacement of the officials to include the aiding and abetting Governor who ultimately is responsible for the noted misconduct

2. Racial discrimination that is a matter of race is racism and against the law that absolutely should not be interfered with in conflated reference to the defendant's proposals. The State cannot ignore or circumvent federal law as a matter of law as instant State benefits in entitlement to the false trans-gender assertion made by defendants as such. Racial discrimination is not transgender discrimination. Racial discrimination dynamics as is currently the civil rights law has absolutely nothing whatsoever to do with in any way or associated or connected with conflated references made by the defendants anti-Christian proposals. Defendants claims are based on significantly false misrepresentations premises made by defendants false propositions also of State of Delaware by the fraudulent defendants specifically Equality Delaware Foundation Inc., The defendants manifest unconstitutionality materially lacks legal standing to propose these comprehensive monolithic unconstitutional changes suggested that will cause social upheaval

PLAINTIFFS PRESENTATION OF IMPORTANT MATERIAL LEGAL QUESTIONS OF CONSTITUTIONALITY OF THE PROPOSED 225 APPLICATIONS IN CONSIDERATION OF FUNDAMENTAL AT RISK DISQUALIFICATIONS OF THE FALSE DEPARTMENT OF EDUCATION PREMISES THAT ARE THE FOUNDATIONS OF THE EQUALLY FALSE CONCLUSIONS OF EQUALITY DELAWARE FOUNDATION INC FALSE ASSERTIONS

1. After careful review and consideration of the literature that was read originating from the State Department of Education and the Equality Delaware Foundation Inc., several objectively reasonable questions are raised in skeptical observations of the motives and motivation of both.
2. Are you seriously suggesting what is essentially the forced access to children treated as a emancipated minor? The impressionable prepubescent developing mind can be easily exploited and controlled by devious calculating adults. In comparison it is much easier to exploit a 10 year old child by external factors compared to a 18 year old. It is a circumvention of every parent's legal right to limit unilateral physical control and or isolation minor children from the parents of at risk of being exploited by devious twisted adult. There is a urgent crisis created when a child is not under the control of the custodial guardianship of the parent but rather unilaterally isolated by circumstances controlled by the Department of Education administrators and or someone equally disconnected and socially detached from that child. It is objectively unreasonable to isolate any child to the potential of the real risk of exploitation that is connected with inputs controlled by adult from Equality for Delaware foundation Inc. Whereas access is permitted to real public safety potential for physical or sexual exploitation and of physical or psychological abuse of children absent the parent is a public safety issue of concern created by the State and subjective interest of adults in terms of forced Department of Education access that should never be permitted in the first instance by outsiders who are materially outside of that child's caring family members. There is no legitimate rational for any considerations of what is described as a unreasonably real potential for exploitation of children's safety placed at real risk by the State

3. Christian **GOD** centered authority is a matter of fact and Delaware constitutional law and not that as falsely asserted by these twisted anti-Christian so call trans gender and homosexual activist pushing their individual rights to practice their perversion nevertheless constitutionally they do not have the right under the law of **GOD** or of man to force their perverse twisted non reproductive suicidal culture on our children and on the rest of us against our will and our equally significant **GODLY** legally protected liberties to be in opposition that are equally important viable and justified as those of these people as established by both the absolute authority of **GOD** and by the doctrines and the mandates of the 1897 Delaware Constitution.

Ephesians 6:4: Train up a child in the way he should go; even when he is old he will not depart from it. God is telling the parent, not our government. No one can deny that many of the founding fathers of the United States of America were men of deep religious convictions based on the Bible and fair Jesus Christ. Of the fifty-six men who signed the Declaration of Independence, nearly half (24) held seminary or bible school degrees. We can see this in our forefathers' formation of the 1776 Constitution of Delaware, Article 22. Even though an antecedent to the one we have now here in Delaware, it still shows historical significance to how they viewed God in making any dissention that would affect our countrymen, and that included the children, for they are our future. Having complete say of what our kids will do and will not do in school is a parent's unalienable right. Everything about Regulation 225 is wrong and completely disastorous to the family which is the fabric of our nation. School means an institution for educating our children academically; that is it – nothing else. Anything outside of that is an infringement of a God given right and that parental right is the law, meaning such rights are handed down by the Supreme Court. Example: In Meyer v. Nebraska, the Court chastened the legislature for attempting to interfere with the power of parents to control the education of their own children. In the same decision, the Supreme court also recognized that right of the parents to delegate their authority to a teacher in order to instruct their children was protected within the liberty of the fourteenth amendment.

IN CONCLUSION THE TRUE FACTUAL REASON FOR THE IMMORAL DECEPTION CREATED BY THIS DEVIOUS PROPOSAL 225 IS TO BE VIEWED AS A HOSTILE TAKEOVER OF THE TRADITIONAL FAMILY UNLAWFULLY BY SEPARATING PARENTS FROM CHILDREN BECAUSE AFTER 8 YEARS OF RIGHT OF HOMOSEXUAL MARRIAGE NOT ONE FAMILY HAS BEEN CREATED NATURALLY OR EVER WILL BE BECAUSE HOMOSEXUALS CANNOT PRODUCE CHILDREN THUS THE ACTUAL TRUE REASON TO RECRUIT OTHER PEOPLES CHILDREN FOR FORCED COVERT HOMOSEXUAL INDOCTRINATION INTO THIS BIZZARE CULTURAL EXPERIMENT

1. The proposal materially is a unjustified fraud. Based on immoral deception created by a tiny fraction of homosexual and transgender activist that are collectively employing money and unconscionable unscrupulous misrepresentations. Perpetrated on the majority of non homosexual society and the Christian communities as a forced social takeover to control your children. By a tiny fraction of society and in fact a tiny number of homosexual and transgender communities in Delaware forcing this devious intent and intentions on the rest of us against will or our interests.
2. The current anti Christian ungodly proposals have a true antecedent origin and reason and reasoning for being push now factually dating back to 2010. It is a material fact that man granted to man a right that **GOD** did not nor never would which is the legal right absent **GOD** to marry.
3. **GOD** condemns ALL homosexual to death by **GOD**'s authority as a matter of fact which is and was the instant fate of antecedent and prior societies of sodomites and gomorrhahrites as proscribed by **GOD** almighty. Those perverse practices and communities were condemned by **GOD** two cities and all of the inhabitants burned to the ground. Recruitment and indoctrination of your children into this perverse community this deception of theirs is the real reason as a matter of material fact for this proposal. That is Equality Delaware foundation Inc., calculus and Department of Education colluding pretext are to undermine and to circumvent and to attack the established stability and abilities of the traditional family. Traditional marriage which naturally is a **GODLY** union between a man and a woman is under attack and as a expected natural result that **GODLY** union reproduce viable offspring your children they want yours lacking their own.